

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
BEAUFORT DIVISION

United States of America,

v.

Russell Lucius Laffitte,

Defendant.

Case No. 9:22-cr-00658-RMG

**Consent Motion for an Extension of Time for Pre-Trial Deadlines**

Pursuant to Rule 45 of the Federal Rules of Criminal Procedure, Defendant Russell Lucius Laffitte, by and through undersigned counsel, hereby moves the Court for a short extension of time concerning the pre-trial deadlines in this case. In support thereof, Mr. Laffitte states as follows:

1. On September 22, 2022, the Court issued its Order concerning discovery and pre-trial matters. (Order, ECF No. 68.) As it concerned pre-trial matters, the Court required the Government and Mr. Laffitte to “furnish and file pre-trial briefs, voir dire, jury instruction requests, exhibit lists, and witness lists consistent with the applicable authorities including Special Instructions for Cases Before Judge Richard Mark Gergel no later than 5:00 p.m. on October 28, 2022.” (*Id.* at 2.)
2. Pursuant to the Court’s Order, on Friday, October 28, 2022, Mr. Laffitte and the Government will confer about exhibits and witnesses. However, in order to finalize exhibits and witnesses for his defense, Mr. Laffitte requests that the Court extend the Friday, October 28, 2022, deadline to Monday, October 31, 2022. Because the extra time will enable Mr. Laffitte to finalize his witnesses for trial and present a robust defense, “good cause” exists for this short extension under Rule 45.
3. Moreover, the Government consents to a short extension for these pre-trial matters.

4. Accordingly, Mr. Laffitte requests that this Court GRANT this Consent Motion for an Extension of Time for Pre-Trial Deadlines.

Respectfully Submitted,

/s/ E. Bart Daniel

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E. Bart Daniel  
Federal Bar No. 403  
Nelson Mullins Riley & Scarborough LLP  
E-mail: [bart.daniel@nelsonmullins.com](mailto:bart.daniel@nelsonmullins.com)  
Phone: (843) 853-5200  
151 Meeting Street, 6th Floor  
P.O. Box 1806 (29402-1806)  
Charleston, SC 29401-2239

/s/ Matt Austin

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Matt Austin  
Federal Bar No. 11435  
Nelson Mullins Riley & Scarborough LLP  
E-mail: [matt.austin@nelsonmullins.com](mailto:matt.austin@nelsonmullins.com)  
Phone: (843) 853-5200  
151 Meeting Street, 6th Floor  
P.O. Box 1806 (29402-1806)  
Charleston, SC 29401-2239

/s/ Christian Joshua Myers

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Christian J. Myers  
Federal Bar No. 13096  
Nelson Mullins Riley & Scarborough LLP  
E-mail: [josh.myers@nelsonmullins.com](mailto:josh.myers@nelsonmullins.com)  
Phone: (202) 689-2800  
101 Constitution Avenue NW, Suite 9000  
Washington, DC 20001

*Attorneys for Russel Lucius Laffitte*

Charleston, South Carolina  
October 26, 2022